BEFORE THE FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Federal-State Joint Board on)
Universal Service)

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CC Docket No. 96-45

REPLY COMMENTS OF
THE COMMUNITY TECHNOLOGY CENTERS' NETWORK (CTCNET)

The Community Technology Centers' Network (CTCNet) wishes to formally endorse and supplement the comments on Universal Service which were submitted as joint comments by the People for the American Way, Alliance for Community Media, Alliance for Communications Democracy, Benton Foundation, Center for Media Education, League of United Latin American Citizens, Minority Media and Telecommunications Council, National Council of La Raza, and National Rainbow Coalition, hereafter referred to as the Joint Coalition, and separately by the Edgemont Neighborhood Coalition in Dayton, Ohio.

In particular, CTCNet endorses the four principles submitted by the Joint Coalition:

1. Basic telecommunications services are essential to ensure full citizen participation in society.

2. The new Universal Service provisions of the Telecommunications Act expand upon, but do not replace, the Commission's Universal Service goals under the 1934 Communications Act.

3. The Commission should recognize the importance of Institutional Access to advanced services.

4. The Commission should broadly construe the Universal Service principles of section 254(B) of the Telecommunications Act in considering:
   - Quality Services at Just, Reasonable, and Affordable Rates;
   - Advanced Telecommunications and Information Services; and
   - Low-Income Citizens, Producers, Residents, and Consumers.

CTCNet is an organizing support project for existing and emerging community agencies developing technology programs for those who otherwise would not have access to computers, technology tools, telecommunications, and the support needed to make use of them. CTCNet is based upon the achievements of Playing to Win, Inc. (PTW), a 16 year-old nonprofit originating in Harlem, New York, and nationally recognized as a pioneer and leading advocate of equitable access to computer-based

technologies. PTW and the Network which was established under its auspices were built upon the principles that technology is a tool to help participants achieve their own goals; students work collaboratively as much as individually and learn as much from play as from work; teachers are facilitators, resources and participants in the learning process; curriculum is project-based. The PTW Harlem Center has provided a range of computer-based learning and exploring opportunities since 1983, and in 1990 the National Science Foundation (NSF) provided PTW with funding to establish a network of 45 centers across the eastern United States. The Network provides written, video, and multi-media materials; on-site, telephone, and electronic assistance; support with regional coordinators, specialized consultants, and volunteers as well as central staff; local workshops, regional gatherings, and an annual All-Affiliates Conference (this year June 14-16 at Boston University); and numerous corporate and organizational collaborations and support resources. Affiliates include settlement houses and store fronts, museums, libraries, and community cable access centers; after-school, literacy, and arts programs; agencies for the homeless, the mentally and physically-disabled, ex-offenders, and children of alcohol and substance abusers--a range which vividly demonstrates the Network's potential for reaching those ordinarily disenfranchised from technology in general and telecommunications in particular.

In 1995, NSF provided additional support to the Education Development Center (EDC) in Newton, MA, to expand nationally over the following five years what officially has become the Community Technology Centers' Network, or CTCNet. There are currently 70+ affiliates throughout the U.S. and internationally, with clusters in New York, New England, Ohio, and Washington, DC. The Edgemont Neighborhood Coalition represents one of 14 centers in the Ohio Community Computing Center Network (OCCCN), established by the $2.2 million agreement in the Ameritech-Ohio Alternative Regulation Case, which is an affiliated partner in CTCNet. Many of the community cable access centers which belong to the Alliance for Community Media and are in the process of being transformed into new media centers that include the full range of emerging technologies and telecommunications are also members. CTCNet envisions a network of 250-300 centers and programs by the turn of the millennium. Clearly there are hundreds, even thousands of similar community technology programs struggling to give birth to homes for telecommunications access for those who otherwise would have little access to emerging technology and telecommunications. SeniorNet itself has a growing number of centers, too. We urge you to help nourish these centers as key points of access along the road to Universal Service.

CTCNet originally used telecommunications as one of the major communications vehicle for keeping the directors of affiliate centers and central network staff in touch with each other. The Network's original home was on PBS/Learning Link. The Network moved in 1994 to the Institute of Global Communications (IGC), set up a number of conferences and resources there, and last year established its own domain on IGC. Most recently, CTCNet has moved in the direction of working through numerous electronic lists and on the web as affiliates have opted for and been encouraged to developed appropriate relations with local Internet Service Providers and as telecommunications has expanded from being strictly an

administrative communications media towards becoming one of the central applications for affiliate participant users themselves. CTCNet web resources are developed through the combined resources of EDC, IGC, and affiliate and associate members. Hence, all 70+ members are connected through the most appropriate option, with a range of technology sophistication that matches their capabilities, budget, and resources. CTCNet affiliate configurations range from, at the low end, those with a single machine connected via a non-dedicated line which has to be manually connected for each use with a very slow modem which has text-based access only, all the way up, at the high end, to a fully-networked facility with its own server, all workstations having high-speed connections through a T-1 connection, and a range of on-line curricular materials, projects, and experienced volunteers. It is an important range by which to gauge the meaning of "Universal Service."

As a membership organization with substantial growth in terms of partnerships/ collaborations as well as affiliates (see our web page at http://www.ctcnet.org), CTCNet's approach towards integrating telecommunications resources with basic computer and literacy access, training, and technical assistance at local centers provides a proven and growing practical yet idealistic strategy for reaching those most in need and achieving--though strengthening neighborhood institutions with access to equipment, peripherals, applications, telecommunications, specialized content, projects, and support--universal technology access.

In doing this, CTCNet wishes to underline the benefits the Joint Coalition stressed in their third set of comments regarding Institutional Access to advanced telecommunications (pp. 8-9), and we concur in their urging: "The Joint Board and the Commission should not only adopt expansive definitions of services and support mechanisms in applying these new guidelines to schools and libraries, but it should recognize the role of all institutions--schools, libraries, community computing centers, and community media centers--in bringing new services and technologies to all Americans." As the Edgemont Neighborhood Coalition reminds us, this echoes a central finding of the National Information Infrastructure Advisory Council, established by Executive Order in 1993, in its final report, *Kickstart Initiative: Connecting America's Communities to the Information Superhighway:* "The quickest, most efficient way to do this is to bring the Superhighway to the neighborhood--to schools, libraries, and community centers."

> Community centers represent an excellent supplement to schools and public libraries in terms of meeting the lifelong learning needs of a community and providing public access to the Information Superhighway. Connecting community centers to the Superhighway may also service to fill in the gaps left by schools and public libraries. Connecting community Centers can fulfill the access needs of the nonschool population of a community; can extend the hours that access to the Information Superhigway is available to the community, can bring the community closer together, and can create a point of access for special interest groups with a community -- e.g., senior citizens, veterans, Native Americans, etc. -- who might not otherwise access the Superhigway. (Edgemont, p. 10; *Kickstart*, pp. 3, 6)

In the words of the Joint Coalition, not only does such access "serve as a gateway to allow individuals far greater access to these services than they would otherwise receive" and provide "an efficient use of scarce universal service resources," it does so while making "highly efficient use of telecommunications resources" in a setting which "provide[s] fundamentals training, skills building, information exchanges, and technical support."

Regarding "training ...and technical support," CTCNet involves a range of corporate and organizational partnerships working together to bring this about. Major partnerships with Apple Computer, Inc., and the Lotus Development Corporation as well as favored status with the National Cristina Foundation have resulted in hundreds of thousands of dollars worth of hardware and software support going to neighborhood centers. Through the Alliance for Public Technology, the Alliance for Community Media, the Benton Foundation, and Computer Professionals for Social Responsibility (CPSR), CTCNet has been able to help develop an awareness of and involvement in public policy issues with grassroots organizations, and has done so along with expanding community cable access centers' own definition of universal and community access, developing Network relations with national policymakers and funding/resource providers. CPSR presented CTCNet Founder Antonia Stone with its national Public Service Award in 1994, and, in addition to CPSR, CTCNet has developed a range of volunteer sources including Americorps*VISTA and the national Technology Resource Consortium (TRC) of nonprofit technology assistance centers such as the Boston Computer Society, CompuMentor (San Francisco), Nonprofit Technology Resources (Philadelphia), and the Information Technology Resource Center (Chicago). And, most importantly, CTCNet has helped leverage the resources of affiliate members for each other (note especially affiliate members who have their own web pages).

Additional collaborations indicating leveraged support include our involvement with specific projects and constituencies such as the United Neighborhood Houses of NY, the country's largest settlement house association; the "Computers in Our Future" Project for California, under the direction of Community Partners, for which the Wellness Foundation has provided major support ($1.25 million); and HUD's programs for developing Computer Learning Centers through its Neighborhood Networks and Campuses of Learning for subsidized and public housing. Collaborations with TERC in Cambridge, the New York Hall of Science, and Lawrence Berkeley Labs indicate the growth of technology, science, and math resources reinforcing those of NSF.

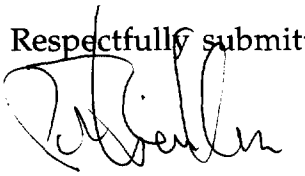
CTCNet and its affiliates have a variety of expansion directions, individually and collaboratively, especially with regard to reaching towards Universal Telecommunications Service. One of the keys to CTCNet's plans for expanding public access to telecommunications and the NII lies in assisting members in developing access, content, projects and support through their own resources and with local service providers, FreeNets and the National Public Telecommunications Network, PBS-supported Community-Wide Education and Information Services, or CWEIS projects (e.g., http://www2.wgbh.org/MBCWEIS/mbcweisHome.html), and

other community telecommunications projects to establish community points of presence for those least likely to make use of the NII on their own.

In sum, Institutional Access builds self-sustaining, self-help, and empowering telecommunications institutions in the very communities which need them most.

We trust the Joint Board will share this basic orientation as its members define the rules of Universal Service in your deliberations.

Respectfully submitted,



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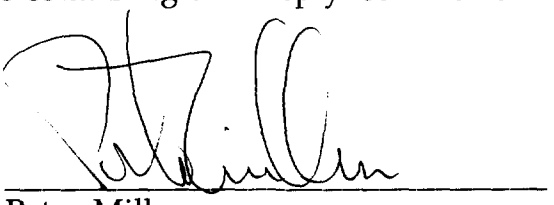
CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 7th day of May, 1996, I caused copies of the foregoing "Reply Comments: to be served by mail, first class postage prepaid, on the parties listed in pages 66 to 70 in the Notice of Proposal Rulemaking. I further certify that I submitted a diskette containing the "Reply Comments" as required on page 62 of that Notice.



Peter Miller